

# NICHOLAS GOODMAN & ASSOCIATES, PLLC

333 PARK AVENUE SOUTH, SUITE 3A  
NEW YORK, N.Y. 10010

H. NICHOLAS GOODMAN  
PATRICK L. SELVEY, JR.

ALFRED R. FUENTE  
COUNSEL

(212) 227-9003

CAMILLE M. ABATE  
ROBERT P. PREUSS\*  
OF COUNSEL  
\*ALSO ADMITTED IN NEW JERSEY

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**VIA ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 618  
New York, NY 10007

**Re: Guzman v. 26 Motors Corp. et al.**  
**Case No. 1:23-cv-00283-KPF**

Your Honor,

We write on behalf of Defendants in the above referenced matter in response to the baseless allegations set forth in the letter e-filed by counsel for the Plaintiff earlier this afternoon. Doc. No. 39. Specifically, the assertion that “Ms. MORA has colluded with Defendants and their counsel to avoid payment of accrued legal fees” is deeply offensive, is so completely without foundation that it may exceed the protection afforded by the judicial privilege and constitute libel *per se* even within the confines of this litigation.

Plaintiff’s disagreement with her counsel regarding fees is her own business, but the accusation leveled against this firm is simply outrageous, and Mr. Lee’s careless disregard for the truth of the situation does not befit his station as an officer of this Court.

We request a conference at the Court’s earliest convenience regarding an application for, *inter alia*, an Order striking Mr. Lee’s letter from the record and directing him not to make any similarly baseless accusations in the future.

Thank you for your consideration in this matter.

Respectfully submitted,



Patrick L. Selvey